

REMARKS

Status of the Application

Claims 1-103 are all the claims pending in the Application, as claims 98-103 are hereby added. Claims 1-97 have been rejected.

Obviousness Rejection

The Examiner has again rejected, under 35 U.S.C. § 103(a): (1) claims 1-4, 6-29, 31-54 and 56-97 as being unpatentable over *Loveman et al.* (US 6,211,869; hereinafter “*Loveman*”), in view of *Clarin et al.* (US 6,414,725; hereinafter “*Clarin*”); and (2) claims 5, 30 and 55 under 35 U.S.C. § 103(a) as being unpatentable over *Loveman* in view *Clarin* and a printout from *VideoUniversity.com* (hereinafter “*VideoUniversity*”). These rejections are respectfully traversed.

As an initial matter, Applicants respectfully submit that one of ordinary skill in the art at the time of the invention would not have been motivated to modify *Loveman* in view of *Clarin* as the Examiner alleges, for at least the reasons discussed in the July 20, 2004 Amendment.

Additionally, even if it were possible to modify *Loveman* in view of *Clarin* as the Examiner has alleged, Applicants respectfully submit that neither reference, nor any reasonable combination thereof, teaches or suggests all of the features of amended independent claims 1, 22, 24, 26, 47, 49, 51, 72, 74, 76, 77 and 78.

Considering claim 1, for example, the applied references fail to teach or suggest *at least* “an ingest system for receiving content in an initial format and reformatting the received content into content having a first format with a lower resolution, content having a second format with a

higher resolution, and content having a third format with a lowest resolution,” as required by that claim.

Specifically, the applied references fail to teach or suggest the provision of content in a third resolution lower than the lower resolution content used in editing. Rather, *Loveman* discloses the use of only two different resolution formats, while *Clarin* fails to disclose a third format having the specified lowest resolution.

The other independent claims recite similar limitations, and hence are patentable for at least the same reasons.

Accordingly, Applicants respectfully submit that independent claims 1, 22, 24, 26, 47, 49, 51, 72, 74, 76, 77, and 78 are patentable over the applied reference. Further, Applicants respectfully submit that rejected dependent claims 2-21, 23, 25, 27-46, 48, 50, 52-71, 73 and 75 are: (1) allowable at least by virtue of their dependency; and (2) separately patentable over the applied references.

For example, Applicants respectfully submit that dependent claim 16’s recitation that “the ingest system superimposes timecodes on individual image frames of the lower resolution content so that the timecodes may be read at the edit station after storage,” is not taught or suggested by any of the applied references. Rather, the portion of *Loveman* cited by the Examiner that allegedly shows this feature only displays a timecode on an editing screen. There is no teaching or suggestion that the displayed timecode is actually superimposed on the individual frames as claimed.

Claims 41 and 66 recite similar limitations, and hence are submitted to be patentable for at least the same reasons.

Amendment Under 37 C.F.R. § 1.111
U.S. Appln. No.: 09/829,584

Attorney Docket # A8692 /
SVL920010023US1

New Claims

Claims 98-103 are hereby added. Claims 98-103 are fully supported by 6, 18 and 19 of the Specification as filed. Claims 98-103 are respectfully submitted to be allowable at least by virtue of their dependency, and separately patentable over the applied references by virtue of the features recited therein.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-103 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-103.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



Timothy P. Cremen
Registration No. 50,855

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: March 3, 2005